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Attorneys for the United States

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

APPROXIMATELY \$269,565.50 SEIZED FROM
FIRST RELIANCE BANCSHARES, INC.
ACCOUNT NUMBER 5220000969, HELD IN THE
NAME OF LIFESTYLE DEVELOPMENT, LLC,

APPROXIMATELY \$1,373.95 SEIZED FROM
VALLEY NATIONAL BANK ACCOUNT
NUMBER 8843534202, HELD IN THE NAME OF
LIFESTYLE DEVELOPMENT, LLC,

APPROXIMATELY \$7,982.56 SEIZED FROM
FIRST RELIANCE BANCSHARES, INC.
ACCOUNT NUMBER 5210000745, HELD IN THE
NAME OF THOMAS EIDE,

APPROXIMATELY \$50,000.00 SEIZED FROM
MAINSTREET BANK ACCOUNT NUMBER
2010039009, HELD IN THE NAME OF PRV
INTERNATIONAL, LLC,

APPROXIMATELY \$36,650.38 SEIZED FROM
BANK OF AMERICA, N.A. ACCOUNT NUMBER
383019458700, HELD IN THE NAME OF
VITAKEM NUTRA, AND

2:24-MC-00402-DJC-CSK

STIPULATION AND ORDER EXTENDING
TIME FOR FILING A COMPLAINT FOR
FORFEITURE AND/OR TO OBTAIN AN
INDICTMENT ALLEGING FORFEITURE

1 APPROXIMATELY \$37,886.31 SEIZED FROM
2 SOUTHSTATE BANK, NA ACCOUNT NUMBER
3 8010002012630, HELD IN THE NAME OF
4 SARAH NICK,

5
6 Defendants.

7 It is hereby stipulated by and between the United States of America and potential claimants
8 Thomas Eide on behalf of himself and Lifestyle Development, LLC, by and through their respective
9 counsel, Erick Reyes-Villa as representative for PRV International, LLC, Bret Hoyt as representative for
10 Vitakem Nutraceutical, Inc., and Sarah Nick, on behalf of herself, appearing *in propria persona*
11 (“claimants”), as follows:

12 1. On or about May 7, 2024, the U.S. Postal Inspection Service (“USPIS”) seized the above-
13 referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively “defendant
14 funds”).

15 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to
16 send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an
17 indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of
18 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
19 deadline is October 4, 2024.

20 3. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
21 January 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture
22 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to
23 forfeiture.

24 4. Accordingly, the parties agree that the deadline by which the United States shall be
25 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment

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alleging that the defendant funds are subject to forfeiture shall be extended to January 2, 2025.

Dated: 10/3/2024

PHILLIP A. TALBERT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: 9/30/2024

/s/ Daniel Olmos
DANIEL OLMOS
Attorney for potential claimant Thomas Eide on
behalf of himself and Lifestyle Development, LLC
600 University Avenue
Palo Alto, CA 94301
(Signature authorized by email)

Dated: 10/1/2024

/s/ Erick Reyes-Villa
ERICK REYES-VILLA
Potential Claimant on behalf of
PRV International, LLC
Appearing in propria persona
1055 Thomas Jefferson Street NW, Suite 620
Washington, DC 20007
(Signature authorized by email)

Dated: 10/3/2024

/s/ Bret Hoyt
BRET HOYT
Potential Claimant on behalf of
Vitakem Neutraceuticals, Inc.
Appearing in propria persona
811 W. Jericho Turnpike
Smithtown, NY 11787
(Signature authorized by email)

Dated: 10/3/2024

/s/ Sarah Nick
SARAH NICK
Potential claimant, *Appearing in propria persona*
2027 Brick Kiln Parkway
Mount Pleasant, SC 29466
(Signature authorized by email)

IT IS SO ORDERED.

Dated: October 8, 2024

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE